- 1.1 The Submitter, Mr Steve Davies (Submitter 19/147), original submission was essentially phrased in two parts;
 - Rationalising the current Residential Resource Area (4)
 boundary to encompass the degree of residential development
 consented under EC Decision 2017 NZEnv193; and
 - b. To extend the Residential Resource Area (4) boundary to encompass an additional 2.5 hectares of land which currently sits within the Rural Resource Area.
- 1.2 While not overly explicit, the Submitter's original submission (19/147) was intended to support the retention of the Residential Resource Area (4) as it relates to his land and for that Zoning (Residential Resource Area (4)) to extend over additional areas of his site. In drafting the submission, the Submitter's intent was to seek the retention of the densities pertaining to the Residential Resource Area (4) being a minimum of 1,500m² and an average of 2,000m². Notwithstanding, the Submitter further submitted in support on submission 19/135 to consider a reduced allotment area for residential development in the Large Lot Residential Zone.
- 1.3 In advising the Submitter on the intent of Plan Change 19, the Submitter generally supports the intent to reclassify the Residential Resource Area (4) as Large Lot Residential, however opposes the increase in the minimum allotment size from what is currently 1,500m² (with an average of 2,000m²) to a minimum of 2,000m² only. This has prompted the Submitter to support the relief sought by Submitter 19/135 as it relates to the minimum density only.
- 1.4 The Council's s42A report (prepared by Consultant Planner, Ms Liz White) suggests a retention of the proposed 2,000m² minimum on the basis that Ms White does not, "consider it appropriate to amend the densities such that the number of variations increase further, particularly where the change sought does not relate to maintaining existing amenity and character."¹ A cursory overview of the Bannockburn township details an extensive variation is allotment sizes that sit below the suggested 2,000m² minimum. To suggest that the existing amenity and character of Bannockburn is defined by 2,000m² allotments is not considered fully substantiated without further analysing the overall densities that characterises the Bannockburn Township. By way

¹ Paragraph 169, Section 42A Report, Report on Submissions and Further Submissions Part 1 (Provisions).

of a crude analysis, within a 500-metre radius of the Submitter's property, approximately 40%² of all individual land parcels are below 2,000m² in area. While it is acknowledged that Ms White recognises that minimum Lot sizes proposed in PC19 are higher than the current minimum lot sizes applying, it is not considered justified to infer that the average establishes the overall character of Bannockburn when recognising a high proportion of allotments are below 2,000m² (refer to **Figure 1** below):

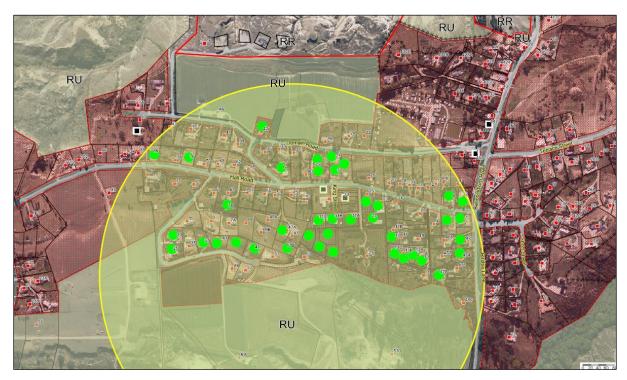


Figure 1: Extract of CODC GIS highlighting allotments with an allotment area less than 2,000m² within 500 metres of Submitter's property.

1.5 While submitter 19/135 seeks a reduced density of 1,200m² minimum with an average of 1,500m², I consider that to go below 1,500m² would represent a fundamental shift in character over and above what presently characterises the immediate vicinity of the Submitter's property. Accordingly, I recommend that the minimum of 1,500m² be retained and suggest that the following change is made:

LLRZ-S1	Density	Activity Status where compliance not achieved:
Large Lot Residential Zone (Excluding Precincts 1, 2 & 3)	1. The minimum site area per residential unit is 2000m². <u>1,500m².</u>	NC

² Approximately 40 allotments out of a total of 101 identified land parcels within 500 metres of the site.